

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

**VIRGINIA McMATH, On Behalf of Herself
and All Others Similarly Situated,**

Plaintiff,

V.

MBNA CORP., BRUCE L. HAMMONDS,
KENNETH A. VECCHIONE, RICHARD K.
STRUTHERS, CHARLES C. KRULAK,
JOHN R. COCHRAN, III, MICHAEL G.
RHODES, LANCE L. WEAVER, and JOHN
W. SCHEFLEN,

Defendants.

Civil Action No. 05cv5168

Filed Electronically

**AFFIDAVIT OF RYAN C. WILLIAMS IN SUPPORT OF DEFENDANTS'
MOTION TO CONSOLIDATE THIS ACTION WITH A RELATED ACTION
AND TRANSFER THESE ACTIONS TO THE DISTRICT OF DELAWARE**

[illegible]

RYAN C. WILLIAMS, being duly sworn, deposes and says:

1. I am an associate with the firm of Sullivan & Cromwell LLP, attorneys for defendants in this action.
2. Attached hereto as Exhibit A is a true and correct copy of the complaint in *Baker v. MBNA Corp.*, No. 1:05-CV-00272-GMS (D. Del. filed May 5, 2005).

3. Attached hereto as Exhibit B is a true and correct copy of the complaint in *Phillips v. MBNA Corp.*, No. 1:05-CV-00277-GMS (D. Del. filed May 9, 2005).

4. Attached hereto as Exhibit C is a true and correct copy of the complaint in *Wilkins v. MBNA Corp.*, No. 1:05-CV-00287-GMS (D. Del. filed May 12, 2005).

5. Attached hereto as Exhibit D is a true and correct copy of the complaint in *Bronstein v. MBNA Corp.*, No. 1:05-CV-00289-GMS (D. Del. filed May 13, 2005).

6. Attached hereto as Exhibit E is a true and correct copy of the complaint in *Penn v. MBNA Corp.*, No. 1:05-CV-00293-GMS (D. Del. filed May 13, 2005).

7. Attached hereto as Exhibit F is a true and correct copy of the complaint in *Jones v. MBNA Corp.*, No. 1:05-CV-00316-GMS (D. Del. filed May 20, 2005).

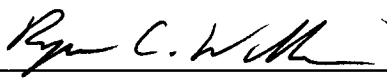
8. Attached hereto as Exhibit G is a true and correct copy of the complaint in *Blum v. MBNA Corp.*, No. 1:05-CV-00372-KAJ (D. Del. filed June 8, 2005).

9. Attached hereto as Exhibit H is a true and correct copy of the complaint in *Cussen v. MBNA Corp.*, No. 1:05-CV-00389-UNA (D. Del. filed June 13, 2005).

10. Attached hereto as Exhibit I is a true and correct copy of the complaint in *Lemon Bay Partners LLP v. Hammonds*, No. 1:05-CV-00327-GMS (D. Del. filed May 25, 2005).


11. Attached hereto as Exhibit J is a true and correct copy of the complaint in *Benoit v. Hammonds*, No. 1:05-CV-00361- KAJ (D. Del. filed June 6, 2005).

12. Attached hereto as Exhibit K is a true and correct copy of the complaint in
Cannon v. MBNA Corp., No. 05-426 (D. Del. filed June 24, 2005).



Ryan C. Williams

Subscribed and sworn to before me
this 7th day of July, 2005.



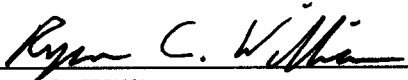
Notary Public

GAURAV I. SHAH
Notary Public, State of New York
No. 02SH6083029
Qualified in New York County
Commission Expires Nov. 12, 2006

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2005 I caused a copy of the foregoing Affidavit of Ryan C. Williams in Support of Defendants' Motion to Consolidate This Action With a Related Action and to Transfer These Actions to the District of Delaware to be delivered by hand to:

Curtis V. Trinko
Law Offices of Curtis V. Trinko, LLP
16 West 46th Street
7th Floor
New York, NY 10036
Telephone: (212) 490-9550
Fax: (212) 986-0158



Ryan C. Williams